

ALEX G. TSE (CABN 152348)  
United States Attorney

BARBARA J. VALLIERE (DCBN 439353)  
Chief, Criminal Division

JOHN C. BOSTIC (CABN 264367)  
DANIEL KALEBA (CABN 223789)  
Assistant United States Attorneys

150 Almaden Boulevard, Suite 900  
San Jose, California 95113  
Telephone: (408) 535-5061  
FAX: (408) 535-5066  
john.bostic@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

UNITED STATES OF AMERICA,	)	CASE NO. 15-CR-00034 EJD
	)	
Plaintiff,	)	UNITED STATES' AMENDED WITNESS LIST
	)	
v.	)	Trial Date: November 27, 2018
	)	Time: 9:00 a.m.
CHRISTIAN REIMER STUKENBROCK,	)	Judge: Hon. Edward J. Davila
	)	
Defendant.	)	

The United States hereby provides notice to the Court and to Defendant of the witnesses it may call in its case-in-chief at trial in this case. The government may not call all of the witnesses on this list. The government respectfully reserves the right to supplement this list as trial preparations progress.

1. Richard Morey: He will testify regarding his role in the founding of SVTG and about the forging of his signature on SVTG documents after he ended his involvement with the company.

2. George Fiegl: He provided money to be used by Defendant's company (SVTG) for investment in various start-ups and business ventures. He will testify about their relationship, his decision to invest his money with Defendant, Defendant's statements regarding how the money would be handled, the agreements the two parties entered into, and the funds he provided for the various

1 investments.

2 3. Kathryn Kanetzke: An FBI forensic analyst who will testify regarding how the monies  
3 invested by Mr. Fiegl were spent during the relevant time period.

4 4. Mike Brown: The managing partner of Shadow Mountain, he will testify regarding  
5 Defendant's role in and investment in Shadow Mountain, through SVTG.

6 5. Faye Fatemi: Defendant's landlord during the relevant time period, she will testify  
7 regarding Defendant's residence, rent payments, and renovations made by Defendant to the property.

8 6. Erin Bachmann: An FBI special agent who will testify regarding the government's  
9 investigation of this matter and the source of certain items of evidence.

10 7. Babak Khodabandeh: A former employee of Defendant's company True Exotic, he will  
11 testify regarding the nature and operations of the business as well as Defendant's control of the  
12 company.

13 8. Anita Esfandiari: A former employee of Defendant's company True Exotic, she will  
14 testify regarding the nature and operations of the business as well as Defendant's control of the  
15 company.

16 9. Afshin Asher: An attorney, he will testify regarding the incorporation and operation of  
17 True Exotic.

18 10. Sterling Pratz: He will testify regarding his relationship with Defendant and Defendant's  
19 failure to invest in his company Autonet.

20 11. Doug Moeller: He will testify regarding his relationship with Defendant and Defendant's  
21 failure to invest in his company Autonet.

22 12. Doug Lodato: He will testify regarding his relationship with Defendant, how SVTG  
23 came to invest in Lodato's film Ticket Out, and Defendant's involvement in the film project.

24 13. Gregory McClatchy: A producer on the Ticket Out film, he will testify regarding his  
25 contact with Defendant and Defendant's involvement in the film project.

26 14. Carey Cadle: An accountant for Protech who will testify regarding false information  
27 provided to him by defendant regarding the ownership and control of SVTG.

28 15. Meredith McClintock: The founder of Ready Solar, she will testify regarding her

agreements with Defendant under which SVTG invested in Ready Solar.

16. Chris Ott: The founder and president of Protech, he will testify regarding his agreements with Defendant for SVTG to invest in Protech, and Defendant's involvement in the business.

17. Patrick McLafferty: A former officer of Protech, he will also testify regarding Defendant's and SVTG's agreements to invest in Protech.

18. Dirk Michels: An attorney specializing in the energy industry, will testify regarding his contact with Defendant and how he introduced Defendant to representatives from certain partner companies.

19. Audrey Stocks: A recipient of several payments from Defendant's personal and corporate accounts, she will testify as to the nature of her relationship with Defendant and the payments she received.

20. Representative from Fedwire: If necessary, a representative from FedWire will testify regarding the service provided by Fedwire and the interstate or international nature of relevant wire transfers in this case.

21. Representative from CHIPS: If necessary, a representative from CHIPS will testify regarding the service provided by the Clearing House Interbank Payments System and the interstate or international nature of relevant wire transfers in this case.

22. Custodians of Records for Relevant Entities: If necessary custodians of records for relevant entities—including the banks for Defendant and SVTG, Fedwire, CHIPS Clearing House, relevant Secretaries of State offices—will testify concerning the authenticity of the documents they provided to the government in connection with this investigation.

DATED: November 25, 2018

Respectfully submitted,

ALEX G. TSE  
United States Attorney

/s/  
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JOHN C. BOSTIC  
DANIEL KALEBA  
Assistant United States Attorneys